



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18th STREET - SUITE 300
DENVER, COLORADO 80202-2466
<http://www.epa.gov/region08>

2005 APR 27 PM 3:55

Ref: 8ENF-W

APR 27 2005

CERTIFIED MAIL 7003 2260 0001 7778 6288
RETURN RECEIPT REQUESTED

FILED
EPA REGION VIII
HEARING CLERK

Rivermeadows Homeowners Association, Inc.
c/o Lorna C. Miller, Registered Agent
5825 W. Mayfly Drive
P.O. Box 730
Wilson, Wyoming 83014

Re: Administrative Order
Docket No. SDWA-08-2005-0017
PWS ID # 5600786

Dear Ms. Miller:

Enclosed you will find an Administrative Order (Order), which the Environmental Protection Agency (EPA) has issued under the authority of the Safe Drinking Water Act (SDWA), 42 U.S.C. Section 300f et seq., and its implementing regulations. Among other things, the Administrative Order finds that Rivermeadows Homeowners Association, Inc. (Rivermeadows HOA) is a supplier of water as defined by the SDWA and that it has violated the National Primary Drinking Water Regulations (NPDWRs) at 40 C.F.R. §§ 141.88, 141.82, 141.83, 141.63(a)(2), 141.21, 141.21(b)(5), 141.153, 141.201, 141.21(g)(1), 141.21(g)(2), and 141.31(b) for failure to monitor source water; not recommending treatment for corrosion control after exceeding the copper action level; not recommending source water treatment after exceeding the copper action level; exceeding the total coliform maximum contaminant level; failure to monitor for total coliform bacteria; failure to adequately complete consumer confidence reports; failure to notify the public of the violations; and failure to report the violations to EPA.

EPA acknowledges that an existing Order issued February 3, 1998 also addressed historical copper violations. EPA is now closing the 1998 Order, Docket No. 8-PWS-VIII-98-03, and issuing this new order to require additional actions to address existing violations.

Violating the enclosed Order may lead to (1) a penalty of up to \$32,500 per day of violation of the Order, (2) a separate such penalty for violating the regulations themselves, and/or (3) a court injunction ordering you to comply.

Among other things, the Order calls for Rivermeadows HOA to provide a public notification of violations of the SDWA. For your convenience, we have enclosed some template forms to assist you in providing the required public notice. If you have any questions or comments concerning the form of



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the public notice, please do not hesitate to contact Gina Andrews of the EPA, whose telephone number is provided below.

Also enclosed is a Small Business Regulatory Enforcement and Fairness Act (SBREFA) Section 22 information sheet. The SBREFA sheet notifies small businesses of their right to comment on regulatory enforcement activities, and provides information on compliance assistance. Dissemination of this information sheet does not constitute an admission or determination by EPA that your business, organization or governmental jurisdiction is a small entity as defined by SBREFA.

Please note that the effective date of the enclosed Order is the date of issuance. Within the next 10 days, please provide EPA with any new information that you believe the Agency is not aware of relating to the alleged violations in the Order. The information should be sent to Gina Andrews at the address on the letterhead and include the mailcode 8ENF-W, or call (800) 227-8917, extension 6688 or (303) 312-6688. If you wish to have in informal conference with EPA, you may also call or write Ms. Andrews. If you are represented by an attorney, please feel free to ask your attorney to call Michelle Marcu, Enforcement attorney, at the above 800 number, extension 6921, or at (303) 312-6921.

We urge your prompt attention to this matter.

Sincerely,


Diane L. Sipe, Director
Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Enclosures

Order
Public Notice template
SBREFA

cc: Wyoming DEQ (via email)
Wyoming DOH (via email)
Jenny Ryan, Asset Environmental Services



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18th STREET - SUITE 300
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2005 APR 27 PM 3:54

APR 27 2005

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EPA REGION VIII
HEARING CLERK

Ref: 8ENF-W

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Teton County Commissioners
c/o Andy Schwartz, Chair
P.O. Box 3594
Jackson, WY 83001

Re: Notice of Safe Drinking Water Act
Enforcement Action against Rivermeadows
Homeowners Association, Inc.
PWS ID # 5600786

Dear Mr. Schwartz:

Under the Safe Drinking Water Act (SDWA), the Environmental Protection Agency (EPA) administers a program for promoting the safety of public water supplies. In Wyoming, the EPA enforces this program directly because Wyoming does not have primary authority for doing so. When EPA issues an administrative compliance order to a public water system in a state that does not have primary enforcement authority under the SDWA, EPA is required to notify an appropriate locally elected official. Accordingly, the purpose of this letter is to notify you that EPA is issuing an administrative compliance order to a public water system in your county.

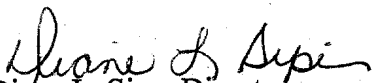
An Administrative Order is being issued under Section 1414 of the SDWA to Rivermeadows Homeowners Association, Inc., Wilson, Wyoming. This Order requires that the public water system take measures to return to compliance with the SDWA and the National Primary Drinking Water Regulations. The System is in violation of 40 C.F.R. §§ 141.88, 141.82, 141.83, 141.63(a)(2), 141.21, 141.21(b)(5), 141.153, 141.201, 141.21(g)(1), 141.21(g)(2), and 141.31(b) for failure to monitor source water; not recommending treatment for corrosion control after exceeding the copper action level; not recommending source water treatment after exceeding the copper action level; exceeding the total coliform maximum contaminant level; failure to monitor for total coliform bacteria; failure to adequately complete consumer confidence reports; failure to notify the public of the violations; and failure to report the violations to EPA.



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A copy of the Order is enclosed for your information. The Order does not require any response or action by the County Commission. If you have any questions regarding this Order, please contact Gina Andrews of my staff at (303)312-6688.

Sincerely,


Diane L. Sipe, Director
Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Enclosure



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2005 APR 27 AM 9:13

FILED
EPA REGION VIII
HEARING CLERK

IN THE MATTER OF)
)
Rivermeadows Homeowners)
Association, Inc.)
Wilson, Wyoming)
)
Respondent)
)
Proceedings under Section 1414(g))
of the Safe Drinking Water Act,)
42 U.S.C. § 300g-3(g))
)

ADMINISTRATIVE ORDER

Docket No. SDWA-08-2005-0017

The following Findings are made and Order is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency ("EPA") by Section 1414(g) of the Safe Drinking Water Act ("the Act"), 42 U.S.C. § 300g-3(g), and its implementing regulations, as properly delegated to the Supervisors of the Technical and Legal Enforcement Programs of the Office of Enforcement, Compliance and Environmental Justice, EPA Region 8.

FINDINGS

1. Rivermeadows Homeowners Association, Inc. (Respondent) is a corporation under the laws of the state of Wyoming as of June 22, 1984 and therefore a "person" within the meaning of 40 C.F.R. § 141.2.
2. Respondent owns and/or operates a system, the Rivermeadows Water District Water System (the System), located in Teton County, Wyoming, for the provision to the public of piped water for human consumption.
3. The System has at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents and is therefore a "public water

system" within the meaning of Section 1401(4) of the Act, 42 U.S.C. § 300f(4), and a "community water system" within the meaning of 40 C.F.R. § 141.2.

4. Respondent owns and/or operates a public water system and is therefore a "supplier of water" within the meaning of Section 1401(5) of the Act, 42 U.S.C. § 300f(5), and 40 C.F.R. § 141.2. Respondent is therefore subject to the requirements of Part B of the Act, 42 U.S.C. § 300g et seq., and its implementing regulations, 40 C.F.R. Part 141.
5. According to a June 23, 2004 sanitary survey by an agent for EPA, Respondent operates a system that is supplied by three wells and serves approximately 117 persons per day through 39 service connections.

FINDINGS OF VIOLATION

I.

1. 40 C.F.R. § 141.88 requires any system which exceeds the lead or copper action level at the tap to collect one source water sample from each entry point to the distribution system within six months after the exceedance.
2. Respondent has not collected source water samples after monitoring results exceeded the copper action level in 1997, 1998 and 2002, and, therefore, has been in continuous violation of 40 C.F.R. § 141.88 from 1997 through December 14, 2004.

II.

1. 40 C.F.R. § 141.82(a) requires community public water systems that exceed the lead or copper action level to recommend treatment for corrosion control. 40

C.F.R. § 141.81 requires the recommendation be completed within six months of exceeding the lead or copper action level.

2. Respondent has not recommended treatment for corrosion control after monitoring results exceeded the copper action level in 1997, 1998 and 2002, and, therefore, has been in continuous violation of 40 C.F.R. § 141.82(a) from 1997 through December 14, 2004.

III.

1. 40 C.F.R. § 141.83 requires systems that exceed the lead or copper action level to complete source water monitoring and make a source water treatment recommendation to EPA within 6 months after exceeding the lead or copper action level.
2. Respondent has not recommended source water treatment after monitoring results exceeded the copper action level in 1997, 1998 and 2002, and, therefore, has been in continuous violation of 40 C.F.R. § 141.83(a) from 1997 through December 14, 2004.

IV.

1. 40 C.F.R. § 141.21 requires community public water systems with a population of less than 1,001 to monitor their water at least once monthly to determine compliance with the maximum contaminant level (MCL) for total coliform bacteria as stated in 40 C.F.R. § 141.63.

2. 40 C.F.R. § 141.63(a)(2) imposes and defines the MCL for total coliform bacteria, applicable to public water systems collecting fewer than 40 samples per month, as no more than one sample collected during the month may be positive for total coliform bacteria.
3. Monitoring results submitted by Respondents for the public water system for April 2004 exceeded the MCL for total coliform bacteria, in violation of 40 C.F.R. § 141.63(a)(2).

V.

1. 40 C.F.R. § 141.21 requires community public water systems with a population of 25-1,000 to monitor their water at least once monthly to determine compliance with the maximum contaminant level (MCL) for total coliform bacteria as stated in 40 C.F.R. § 141.63.
2. Respondent failed to monitor for total coliform bacteria in June 2002, in violation of 40 C.F.R. § 141.21.

VI.

1. 40 C.F.R. § 141.21(b)(5) requires public water systems that collect fewer than 5 routine samples per month and have one or more total coliform positive samples to collect at least 5 routine samples during the next month the system provides water to the public.

2. Respondent failed to collect at least 5 routine samples (4 samples were collected) in July 2004 after a total coliform positive sample in the preceding month, in violation of 40 C.F.R. § 141.21(b)(5).

VII.

1. 40 C.F.R. §§ 141.152-155 require community water systems to prepare and deliver an annual Consumer Confidence Report (CCR) to their customers by July 1st each year.
2. 40 C.F.R. § 141.153 requires the CCR to clearly identify any violations and, dependent upon the violation type, to include the potential adverse health effects and actions taken by the system to address the violations.
3. Respondent failed to identify the June 2002 total coliform failure to monitor violation in its 2002 CCR. In addition, the 2002 and 2003 CCRs state there were no violations and failed to identify the failure to monitor source water, and failure to recommend corrosion control treatment due to the copper exceedance, in violation of 40 C.F.R. §§ 141.152 and 141.153.

VIII.

1. 40 C.F.R. § 141.201 requires owners and/or operators of public water systems to notify the public of any national primary drinking water regulation (NPDWR) violations in 40 C.F.R. Part 141.
2. With the exception of the total coliform MCL violation identified in Section IV of this Order, Respondent has not provided public notice of the noncompliance

detailed in the preceding Sections I through VI of this Order, in violation of 40 C.F.R. § 141.201.

IX.

1. 40 C.F.R. § 141.21(g)(2) requires public water systems that have failed to comply with a coliform monitoring requirement under 40 C.F.R. § 141.21 to report the violation to EPA within ten days after the system discovers the violation.
2. Respondent failed to report to EPA instances of noncompliance detailed in Sections V and VI, in violation of 40 C.F.R. § 141.21(g)(2).

X.

1. 40 C.F.R. § 141.31(b) requires public water systems to report any failure to comply with any National Primary Drinking Water Regulation (40 C.F.R. Part 141) to EPA within 48 hours.
2. Respondent failed to report to EPA the noncompliance detailed in Sections I, II, III, VII and VIII, in violation of 40 C.F.R. § 141.31(b).

ORDER

Based on the foregoing Findings, and pursuant to Section 1414(g) of the Act, IT IS

ORDERED:

1. Respondent submitted monitoring results for lead and copper to EPA for January - June 2004 and July - December 2004, which were below the action levels for both lead and copper as specified in 40 C.F.R. § 141.80(c). Based upon these results, Respondent is not required to conduct source water monitoring or install

optimal corrosion control treatment for lead and/or copper at this time. Upon the effective date of this order, whether or not future sampling results exceed the action levels for lead and/or copper, Respondent shall comply with the requirements specified in 40 C.F.R. Part 141 Subpart I including the monitoring requirements specified in 40 C.F.R. § 141.86.

2. Upon the effective date of this Order, Respondent shall comply with the requirement of 40 C.F.R. § 141.21(a) to perform monthly bacteriological monitoring. Respondent shall comply with the MCLs as stated in 40 C.F.R. § 141.63. Respondent shall report analytical results to EPA within the first 10 days of the end of the monitoring period, as required by 40 C.F.R. § 141.31(a).
3. Upon the effective date of this Order, Respondent shall comply with all sampling requirements specified in 40 C.F.R. § 141.21(b)(5). If Respondent's water system has one or more total coliform positive samples in a month, Respondent shall collect at least 5 routine samples during the next month the system provides water to the public. Respondent shall report analytical results to EPA within the first 10 days following the end of the monitoring period, as required by 40 C.F.R. § 141.31(a).
4. Upon the effective date of this Order, Respondent shall prepare its annual CCR in compliance with 40 C.F.R. §§ 141.152-141.155, including identifying all violations incurred for the reporting year, as required by 40 C.F.R. § 141.153.

5. No later than 30 days from the effective date of this Order, Respondent must provide public notice of the violations, with the exception of the total coliform MCL violation, specified under the Findings of Violation in this Order to return to compliance with 40 C.F.R. §§ 141.201, 141.204 and 141.205. This notice shall be given by (1) mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system; AND (2) any other method reasonably calculated to reach other persons regularly served by the system, if they would not normally be reached by the notice described above, such as publication in a local newspaper, delivery of multiple copies for distribution by customers that provide their drinking water to others, posting in public places served by the system or on the Internet, or delivery to community organizations. If the public notice is posted, the notice must remain in place for as long as the violation or situation persists, but for no less than seven days. The public water system must repeat the notice every three months as long as the violation or situation persists. Upon the effective date of this Order, Respondent shall comply with the public notice requirements at 40 C.F.R. § 141.201 et seq. following any future NPDWR violation. Respondent shall submit a copy of the public notice to EPA within 10 days of completion of the public notice, as required by 40 C.F.R. § 141.31(d).
6. Upon the effective date of this Order, Respondent shall comply with 40 C.F.R. § 141.21(g)(2) by reporting any failure to comply with coliform monitoring

requirements under 40 C.F.R. § 141.21 to EPA within ten days after the system discovers the violation.

7. Except where different reporting periods are specified above, upon the effective date of this Order, Respondent shall comply with 40 C.F.R. § 141.31(b) by reporting any failure to comply with any National Primary Drinking Water Regulation (40 C.F.R. Part 141) to EPA within 48 hours.
8. Reporting requirements specified in this Order shall be provided by certified mail to:

U. S. EPA Region 8 (8P-W-MS)
999 18th Street, Suite 300
Denver, Colorado 80202-2466

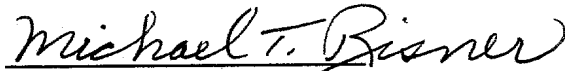
GENERAL PROVISIONS

1. This Order does not constitute a waiver, suspension, or modification of the requirements of 40 C.F.R. § 141.1 et seq., or the Safe Drinking Water Act, which remain in full force and effect. Issuance of this Order is not an election by EPA to forgo any civil or criminal action otherwise authorized under the Act.
2. Violation of any term of this Order may subject the Respondent to an administrative civil penalty of up to \$27,500, under Section 1414(g)(3)(B) of the Act, 42 U.S.C. § 300g-3(g)(3)(B), or a civil penalty of not more than \$32,500 per day of violation, assessed by an appropriate U.S. district court under Section 1414(g)(3)(C) of the Act, 42 U.S.C. § 300g-3(g)(3)(C).
3. Violation of any requirement of the SDWA or its implementing regulations may subject Respondent to a civil penalty of not more than \$32,500 per day of


violation, assessed by an appropriate U.S. district court under Section 1414(b) of the Act, 42 U.S.C. § 300g-3(b).

4. The effective date of this Order shall be the date of issuance of this Order.

Issued this 27 day of April, 2005.



Michael T. Risner, Director
David J. Janik, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice



Diane L. Sipe, Director
Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice



U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements.

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers: <http://www.epa.gov/clearinghouse>

Pollution Prevention Clearinghouse
<http://www.epa.gov/opptintr/library/ppicindex.htm>

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs:
(800) 368-5888

Emergency Planning and Community Right-To-Know Act
(800) 424-9346

National Response Center (to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone and Refrigerants Information
(800) 296-1996

Clean Air Technology Center
(919) 541-0800

Wetlands Helpline
(800) 832-7828

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Program
<http://www.epa.gov/ttn/sbap>

Office of Enforcement and Compliance Assurance
<http://www.epa.gov/compliance>

Compliance Assistance Home Page
<http://www.epa.gov/compliance/assistance>

Office of Regulatory Enforcement
<http://www.epa.gov/compliance/civil/index.html>

Office of Site Remediation Enforcement
<http://www.epa.gov/compliance/cleanup>

Innovative Programs for Environmental Performance
<http://www.epa.gov/partners>

Small Business Ombudsman
www.sba.gov/ombudsman

Instructions for LCR Failure to Install Corrosion Control--Template 2-8

Template on Reverse

Since lead and copper treatment technique violations are included in Tier 2, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation (141.203(b)). You must issue a repeat notice every three months for as long as the violation persists.

Community systems must use one of the following methods (141.203(c)):

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Non-community systems must use one of the following methods (141.203(c)):

- Posting in conspicuous locations
- Hand delivery
- Mail

In addition, both community and non-community systems must use *another* method reasonably calculated to reach others if they would not be reached by the first method (141.203(c)). Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on letterhead, if available.

The notice on the reverse is appropriate for hand delivery or mail. However, you may wish to modify it before using it for posting. If you do, you must still include all the required elements and leave the health effects language in *italics* unchanged. This language is mandatory (141.205(d)).

Explaining the Violation

If the delay in installation is related to outside circumstances, such as funding, you should explain these. Consumers may be more supportive of rate increases or may pressure local authorities to provide funds if they understand the circumstances.

This template is written for systems which are required to install corrosion control after exceeding lead action levels. The Lead and Copper Rule requires some large systems to install corrosion control even if they have never exceeded the lead action level. You may need to modify the template if this applies to you. The following may help you explain the violation:

- This is a treatment violation, but it does not mean there is lead in your drinking water. However, it is important that we take measures to control lead levels in the water, because ingesting lead can cause serious health consequences.

Corrective Action

In your notice, describe corrective actions you are taking. Use the following language, if appropriate, or develop your own:

- We conducted a lead public education program in [month, year]. You should have received a brochure explaining in more detail steps you can take to reduce exposure until corrosion control is in place.

If consumers ask for information on testing their water, you should have on hand the names of laboratories consumers can call. Tell consumers to call NSF International at 1(800) NSF-8010 or the Water Quality Association at 1(800) 749-0234 for information on appropriate filters. For more information on lead, have consumers call the EPA Safe Drinking Water Hotline at 1(800) 426-4791 or the National Lead Information Center Hotline 1(800) LEAD-FYI.

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met all the public notice requirements within ten days after issuing the notice (141.31(d)).

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

[System] Water Contains High Levels of Copper

Our water system recently violated a drinking water standard. Even though this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We routinely sample water at consumers' taps for lead. The tests show lead levels in the water above the limit, or "action level," so we are required to install corrosion control treatment. This treatment helps prevent copper in the pipes from dissolving into the water. Corrosion control should have been installed by [date], but installation is incomplete.

What should I do?

Listed below are some steps you can take to reduce your exposure to copper:

- Run your water for 15-30 seconds or until it becomes cold before using it for drinking or cooking. This flushes any standing copper from the pipes.
- Don't cook with or drink water from the hot water tap; copper dissolves more easily into hot water.
- **Do not boil your water to remove copper.** Excessive boiling water makes the copper more concentrated — the copper remains when the water evaporates.

What does this mean?

Typically, copper enters water supplies by leaching from copper pipes and plumbing components.

Copper is an essential nutrient, but some people who drink water containing copper in excess of the action level over a relatively short amount of time could experience gastrointestinal distress. Some people who drink water containing copper in excess of the action level over many years could suffer liver or kidney damage. People with Wilson's disease should consult their personal doctor.

What happened? What is being done?

[Describe corrective action.]

This is not an emergency. If it had been, you would have been notified immediately. Corrosion control will be in place by [date].

For more information, please contact [name of contact] at [phone number] or [mailing address].

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by [system]. State Water System ID#: _____. Date distributed: _____

Instructions for Monitoring Violations Annual Notice--Template 3-1

Template on Reverse

Since most monitoring violations are included in Tier 3, you must provide public notice to persons served within one year after you learn of the violation (141.204(b)). Multiple monitoring violations can be serious, and your primacy agency may have more stringent requirements. Check with your primacy agency to make sure you meet its requirements.

Community systems must use one of the following (141.204(c)):

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Non-community systems must use one of the following (141.204(c)):

- Posting in conspicuous locations
- Hand delivery
- Mail

In addition, both community and non-community systems must use *another* method reasonably calculated to reach others if they would not be reached by the first method (141.204(c)). Such methods could include newspapers, e-mail, or delivery to community organizations. If you post the notice, it must remain posted until the violation is resolved. If the violation has been resolved, you must post the notice for at least one week (141.204(b)). If you mail, post, or hand deliver, print your notice on letterhead, if available.

The notice on the reverse is appropriate for insertion in an annual notice or the CCR, as long as public notification timing and delivery requirements are met (141.204(d)). You may need to modify the template for a notice for individual monitoring violations. This example presents violations in a table; however, you may write out an explanation for each violation if you wish. For any monitoring violation for volatile organic compounds (VOCs) or other groups, you may list the group name in the table, but you must provide the name of every chemical in the group on the notice, e.g., in a footnote.

You may need to modify the notice if you had any monitoring violations for which monitoring later showed a maximum contaminant level or other violation. In such cases, you should refer to the public notice you issued at that time.

Include in your notice the standard language for monitoring and testing procedure violations in *italics* (141.205(d)(2)). If you modify the notice, you may not alter this mandatory language.

Corrective Actions

In your notice, describe corrective actions you took or are taking. Listed below are some steps commonly taken by water systems with monitoring violations. Choose the appropriate language, or develop your own:

- We have since taken the required samples, as described in the last column of the table above. The samples showed we are meeting drinking water standards.
- We have since taken the required samples, as described in the last column of the table above. The sample for [contaminant] exceeded the limit. [Describe corrective action; use information from public notice prepared for violating the limit.]
- We plan to take the required samples soon, as described in the last column of the table above.

After Issuing the Notice

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met all the public notice requirements within ten days after issuing the notice (141.31(d)).

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Monitoring Requirements Not Met for [System]

Our water system violated several drinking water standards over the past year. Even though these were not emergencies, as our customers, you have a right to know what happened and what we did to correct these situations.

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During [compliance period] we [did not monitor or test] or [did not complete all monitoring or testing] for [contaminant(s)] and therefore cannot be sure of the quality of our drinking water during that time.

What should I do?

There is nothing you need to do at this time.

The table below lists the contaminant(s) we did not properly test for during the last year, how often we are supposed to sample for [this contaminant/these contaminants] and how many samples we are supposed to take, how many samples we took, when samples should have been taken, and the date on which follow-up samples were (or will be) taken.

Contaminant	Required sampling frequency	Number of samples taken	When all samples should have been taken	When samples were or will be taken
VOCs ¹ (example)	1 sample every three years	0	1996-1998	February 1999

What happened? What is being done?

[Describe corrective action.]

For more information, please contact [name of contact] at [phone number] or [mailing address].

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by [system]. State Water System ID#: _____. Date distributed: _____

¹VOCs, also known as volatile organic compounds, are tested by collecting one sample and testing that sample for all the VOCs. VOCs are commonly used in industrial and manufacturing processes. VOCs include benzene, carbon tetrachloride, chlorobenzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, 1,2-dichloroethane, cis-dichloroethylene, trans-dichloroethylene, dichloromethane, 1,2-dichloropropane, ethylbenzene, styrene, tetrachloroethylene, 1,1,1-trichloroethane, trichloroethylene, toluene, 1,2,4-trichlorobenzene, 1,1-dichloroethylene, 1,1,2-trichloroethane, vinyl chloride, and xylene.